

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

GLIMCHER DEVELOPMENT CORP.,	:	Case No. C-1-01-408
	:	
Plaintiff,	:	Senior Judge Herman Weber
	:	
v.	:	
	:	
GATOR FOREST PARTNERS, LTD.,	:	
	:	
Defendant.	:	

MOTION TO ENTER REVISED AGREED PROTECTIVE ORDER

Plaintiff, Glimcher Development Corp. (“Glimcher”), and Defendant, Gator Forest Partners, Ltd., (“Gator”), through their attorneys, have stipulated and agreed to the entry of the Revised Agreed Protective Order attached hereto as Exhibit 1. The Revised Agreed Protective Order revises Paragraph 11 of the previously entered Agreed Protective Order (Doc. 16) by adding a procedural mechanism by which the parties can dispute a confidentiality designation.

Gator respectfully moves the Court to enter this Revised Agreed Protective Order. Plaintiff’s counsel does not oppose either this motion or entry of the Revised Agreed Protective Order.

/s/ Jason M. Cohen_____

Patrick F. Fischer (0039671)

Jason M. Cohen (0076081)

1400 Provident Tower

One East Fourth Street

Cincinnati, Ohio 45202

Tel: (513) 579-6459

Fax: (513) 579-6457

pfischer@kmklaw.com

Attorney for Defendant

Gator Forest Partners, Ltd.

